

CORRESPONDENCE CONTROL
OUTGOING LTR. NO

DOE ORDER # 4100.1

02-RF-00326

DIST LTR ENC

BRAILS FORD, M.D.

FERRERA, D W

FERRI, M S

MARTINEZ, L. A.

PARKER, A.M.

POWERS, K.

SCOTT, G K.

SHELTON, D C

SPEARS, M.S

TRICE, K.D

TUOR, N. R

BUTLER, J L.

DIETERLE, S

GALLOP, J

GIANTI, S.

GIBBS, F

RICHARDELLA, R.

ISOP FOR COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION
ACTIVITIES NOTIFICATION LETTER FOR BUILDING 866 COMPONENT REMOVAL, SIZE
REDUCTION, AND DECONTAMINATION - FEG-002-02

Attached is a draft transmittal letter to the Colorado Department of Public Health and
Environment for the RSOP notification for RCRA unit closure of Interim units 40.17, 40 18, and
40 19 The draft transmittal letter has been prepared from DOE building point of contact to
CDPHE building point of contact; however, it could also be addressed from DOE RFCA
coordinator to CDPHE RFCA coordinator

Please contact Dyan Foss X7577 with questions or concerns.

Frank E. Gibbs

Frank E. Gibbs

Manager, Industrial Facility Disposition

Remediation, Industrial D&D, and Site Services

Kaiser-Hill Company, LLC

CORRESPONDENCE CONTROL

ADMIN RECORDS

TRAFFIC

PATTS/130

CLASSIFICATION

UCNI

UNCLASSIFIED

CONFIDENTIAL

SECRET

AUTHORIZED CLASSIFICATION

SIGNATURE

CJ FAE 1907

Date 02/18/02

IN REPLY TO RFP CC NO

Attachment

as Stated

LF:jlh

org and 1 cc - Steve Tower

ACTION ITEM STATUS

☐ PARTIAL/OPEN

de Legare

LTR APPROVALS

RIG & TYPIST INITIALS

RF-48489 (Rev 9/04)



KAISER-HILL
COMPANY

APR -8 2002

02-RF-00326



Kaiser-Hill Company, L.L.C.

Writer Address Rocky Flats Environmental Technology Site, State Hwy 93 and Cactus, Rocky Flats, CO 80007 • 303 966 7000

Mailing Address PO Box 464, Golden, Colorado 80402-0464

ADMIN RECORD
B865-A-000029

1/14

APR -8 2002

Attachment
Steve Tower
FEG-002-02
1 of 13

DRAFT

David Kruchek
Colorado Department of Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80222-1530

**RSOP FOR COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION
ACTIVITIES NOTIFICATION LETTER FOR BUILDING 866 COMPONENT REMOVAL, SIZE
REDUCTION, AND DECONTAMINATION**

Mr Kruchek

In accordance with the Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Component Removal, Size Reduction and Decontamination Activities, this letter and its attachments is notification for RSOP implementation. This notification is for RCRA unit closure of interim units 40 17, 40 18, and 40 19 in Buildings 866 and 865. Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions, with engineering, health and safety, and waste management information, will be developed prior to start of closure activities. These instructions will be developed in accordance with applicable RFETS policies and procedures.

The appropriate documentation required by the RSOP is attached to this letter and should provide the necessary information. This work will be conducted in accordance with the work control documentation prepared by the subcontractor. The exact methods and process selected by the subcontractor and progress of the activities will be communicated to DOE/LRA through the consultative process, particularly the monthly RISS production meetings. The facility will not be breached during the activity.

As indicated in the RSOP, the LRA has 30 days to review the RSOP notification letter and provide feedback, including a definitive reason for not proceeding with the project. If no feedback is received within 30 days, the project will proceed as planned.

If you have any questions regarding this, please contact me at (303) 966-2133.

Steve Tower
U S Department of Energy

Project scope RCRA Unit closure of units 40 17, 40 18, and 40 19			
Facility description. Building 866, Process Waste Transfer B865			
Description of planned activity(ies) RCRA unit closure			
Facility/rooms/sets/areas involved Building 866, Area AL			
Is RCRA unit closure(s) part of the planned activity?			<input checked="" type="checkbox"/> Yes
If RCRA units are included, attach unit specific information sheets and drawings			<input type="checkbox"/> No
Attach checklists from Appendix A of the RSOP <i>No checklists are provided, the checklists submitted with the Building 865 notification cover the component removal/size reduction/decontamination activities associated with RCRA closure</i>		Component Removal/Size Reduction	
		Decontamination	
RLCR Status	<input checked="" type="checkbox"/>	RLCR complete and concurrence received: 10/17/01	
	<input type="checkbox"/>	RLCR initiated but incomplete; concurrence anticipated:	
	<input type="checkbox"/>	RLC has not been initiated¹ and is scheduled for initiation on	
If RLCR is not complete or initiated, what data will be used to plan the work activities?			
Activity requires modification to the ARARs listed in the RSOP.			<input type="checkbox"/> Yes, attach to letter
			<input checked="" type="checkbox"/> No
Attach Administrative Record file requirements for the activity.			
Point of contact for each facility/activity JR Marschall, 303-966-2372			
Duration of work activities. 60 days		Anticipated work start contract award 1/02 work start 4/02	
Attach schedule for each facility or activity for information purposes. <i>Schedule submitted with the Building 883 notification included the RCRA unit closure activities</i>			
Does the activity involve removing contaminated portions of the building shell? Include a description of the activity, contamination levels and controls			<input type="checkbox"/> Yes, LRA consultation and concurrence required
			<input checked="" type="checkbox"/> No

¹ Evaluate using DPP, Sections 1 1 4 and 1 1 5 and the consultative process to implement activities

Are there deviations/exceptions to the RSOP for the proposed activity(ies)?											Yes	
										✓	No	
Provide an explanation of deviation/exception to the RSOP. Not applicable												
C Check the appropriate resulting action box below												
Additional RFCA decision document required (PAM – IM/IRA)												
Major modification to RSOP								Field change to RSOP				
Minor modification to RSOP								LRA consultation				
Activity(ies) will result in the following waste types											Process waste	
										✓	Remediation waste	
	TRU		LLW	✓	LLMW	✓	Haz.	✓	Sanitary		Other.	
LRA Notification Review Time							14 days, no RCRA unit closure involved					
					✓		30 days, RCRA unit closure involved					

Administrative Record Requirements for this Activity

- Final Rocky Flats Cleanup Agreement (RFCA)
- RFETS Decommissioning Program Plan (DPP)
- RFCA Standard Operating Protocol for Component Removal, Size Reduction, and Decontamination Activities
- Reconnaissance Level Characterization Report 865 Cluster Closure Project
- Building 865 Closure Project Scoping Meeting Minutes/Disposition
- Notification Letter and subsequent CDPHE correspondence, if appropriate

INTRODUCTION

The Rocky Flats Environmental Technology Site's (RFETS) "RFCA Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities, Section 5 0, Revision 0, 4 February 2001" addresses closure of RCRA regulated units

This document applies to Tank T-1, Tank T-2, and Tank T-3, ancillary piping, pumps and secondary containment located in B866, and a sump (145A EB Furnace sump) located in B865. Also included are process waste lines located between B866 and B865 and within B865. The sump and process lines located in B865 are included in this document because they are part of the RCRA Interim Status unit. Complete closure will be accomplished in accordance with one of the options noted in the RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities.

Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions, with engineering, health and safety, and waste management information, will be developed prior to start of closure activities. These instructions will be developed in accordance with applicable RFETS policies and procedures.

SYSTEM HISTORY AND WASTE CHARACTERIZATION

Building 866 was a waste collection station for B865 and B889. Originally, the facility contained five tanks, however, Tanks T-4 and T-5 were removed in 1998. Three 1,200-gallon fiberglass tanks remain in the facility within a secondary containment structure that establishes the building footprint. These tanks were used to store process water solutions from B865 that potentially contained acids, bases, heavy metals, beryllium, hazardous solvents, non-hazardous solvents, alcohols, and detergents. The current Part A RCRA Permit groups the 40 Series (including B866 interim status units). The EPA hazardous waste codes associated with the 40 Series units are D001, D002, D004 through D011, D018, D019, D028, D029, D035, D038, D040, D043, F001-F003, F005, F007, F008, and F009.

Ancillary equipment associated with this facility includes process waste piping, fittings, flanges, valves and pumps used to convey hazardous waste. There is a sump on the west-side of the facility that is connected to the B889 foundation. Two pumps are still located within B866. Above ground piping passes (overhead) between B866 and B865, through the wall of B865, and continues into (B865) Room 140 (i.e., the utility room). Process waste piping is also present in the southeast corner of B865 within the Contaminated Area (CA). Facility management estimates that approximately 500 feet of process waste piping remains in B865.

Closure was attempted on all three tanks in 1998. The closure plan for Tanks T-1, T-2, and T-3 called for clean-closure and reuse. Four closure actions consisting of filling the tanks with a soap and water solution were undertaken for these tanks. Rinstate data indicate that beryllium, cadmium, lead, mercury, and selenium failed to meet closure standards. All other analytes were below the RFCA Attachment 5, Table 2, Tier II - Groundwater Action Levels. All waste generated during the closure of these units will be characterized as D006 (cadmium), D008 (lead), D009 (mercury), and D010 (selenium).

According to "RCRA Tank Closure Activity, Final Report, 30 April 1998", the secondary containment under tanks T-1, T-2, and T-3 all met the clean closure criteria after the second attempt. Sump 145A (located in B865) did not clean close.

System Boundaries

The boundary of the interim status unit includes tanks T-1, T-2, and T-3, ancillary piping and associated equipment. Each fiberglass tank is cylindrical, and has a capacity of 1,200 gallons. These tanks are physically located in a concrete, secondary containment that establishes the footprint of the building. The secondary containment is approximately one foot deep. Ancillary equipment includes:

- Ancillary piping attached to tanks T-1, T-2, and T-3,
- Ancillary piping between B866 and B865,
- Ancillary piping in B865,
- Pumps and valves located in B866, and
- Sump 145A in B865 (concrete)

SOIL CONTAMINATION EVALUATION AND POST CLOSURE CARE

Tanks T-1, T-2, and T-3 are currently contained in concrete secondary containment that has been clean-closed. Therefore, it is anticipated that soil in the area will not be exposed to contaminants (if any) associated with these tanks and/or associated equipment or structures. Soil sampling is not planned with regard to the activities covered by this RSOP. If there are any below grade (process waste) pipes associated with these tanks, they will be addressed by ER during remediation activities. ER will perform any soil sampling associated with removal of below grade piping at that time of remediation.

RECORDKEEPING

RCRA unit closure activities will be documented in the Pre-Demolition Survey Report (PDSR) which will be completed prior to building demolition. When final closure of units 40 17, 40 18, and 40 19 is completed, the Site's Master List of RCRA units will be updated with the closure status and a permit modification will be submitted to remove the units from the RCRA Part A Permit.

BUILDING 866, RCRA UNIT-SPECIFIC CLOSURE INFORMATION

AL	40 17	Tank T-1	RCRA stable
AL	40 18	Tank T-2	RCRA stable
AL	40 17	Tank T-3	RCRA stable
Closure Method		The tanks, piping and pumps will be closed by removal. The EPA code for arsenic (D004) will apply to all waste generated from unit removal (i.e., tanks and ancillary equipment). The concrete secondary containment (i.e., pit) will be clean closed using "Clean Closure Option #3," under Section 5.1.1 of the RSOP for Facility Component Removal, Size Reduction and Decontamination Activities.	
Waste Disposal		Waste, including tanks, ancillary equipment, concrete, etc., will be shipped directly to an approved disposal facility or stored in an onsite storage unit until shipment can be scheduled. Tanks will be deformed in such a way that the tanks are incapable of holding 75 percent of their original volume. All waste will be LLM.	

Best Available Copy

BUILDING 866, RCRA-REGULATED UNITS

AL	40 17	866	Tank T-1	RCRA Stable	D001, D002, D004 through D011, D018, D019, D028, D029, D035, D038, D040, D043, F001-F003, F005, F007, F008, and F009
AL	40 18	866	Tank T-2	RCRA Stable	D001, D002, D004 through D011, D018, D019, D028, D029, D035, D038, D040, D043, F001-F003, F005, F007, F008, and F009
AL	40 19	866	Tank T-3	RCRA Stable	D001, D002, D004 through D011, D018, D019, D028, D029, D035, D038, D040, D043, F001-F003, F005, F007, F008, and F009

— EXISTING PIPING
- - - REMOVED PIPING

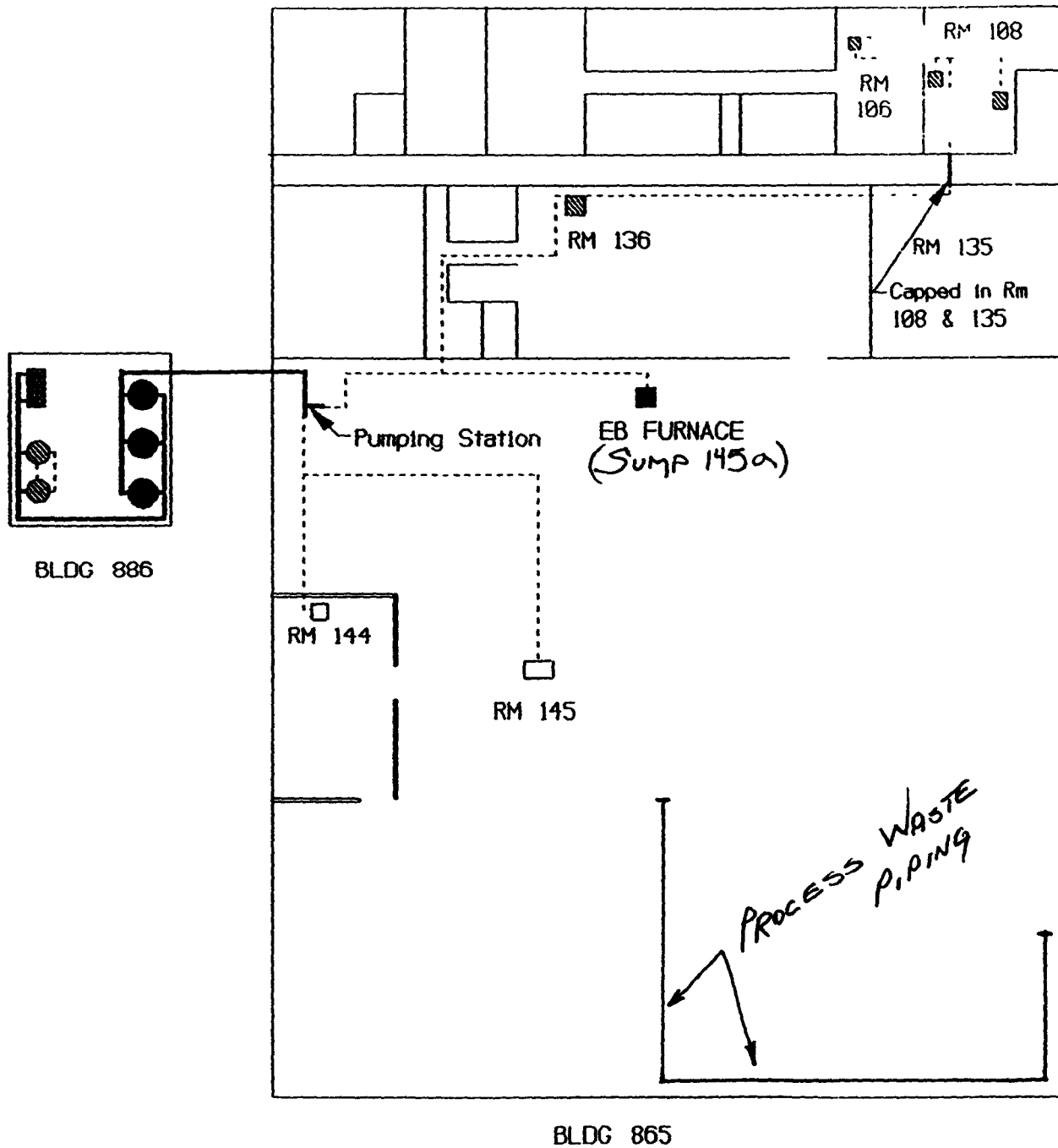
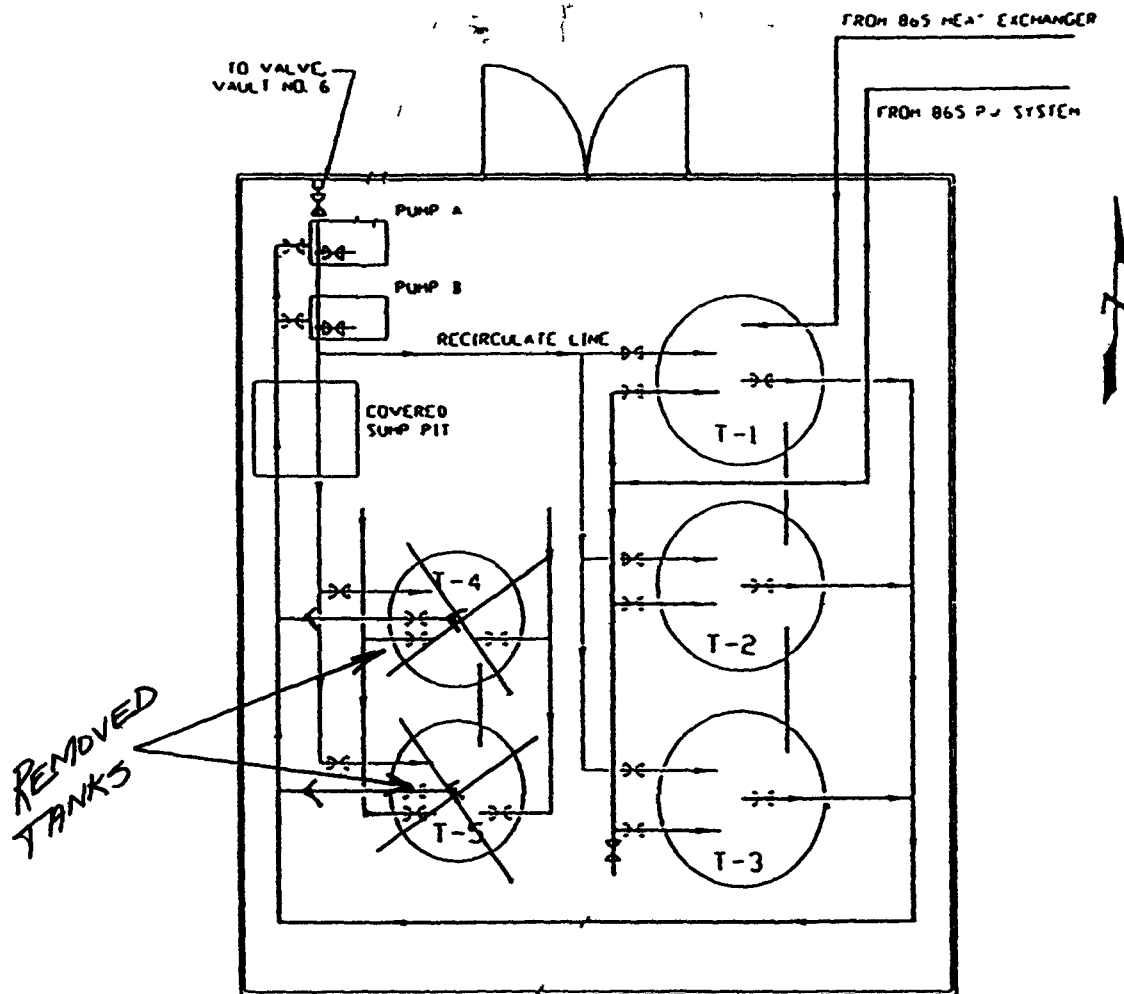
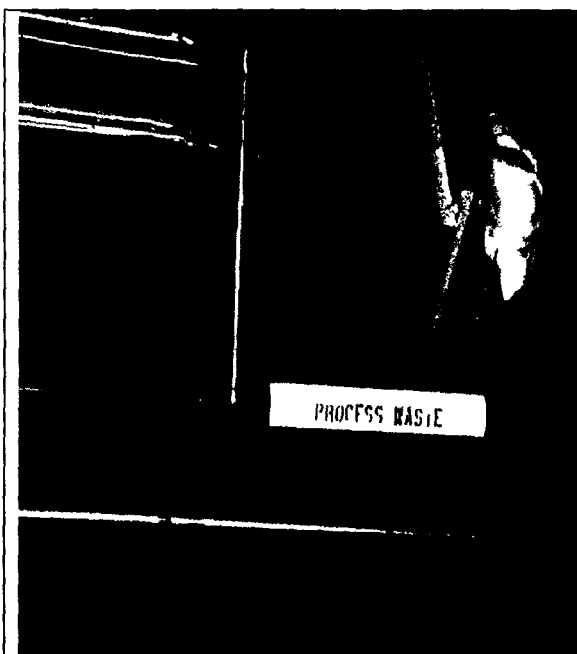


Figure 1 Location of ancillary tanks, sumps and piping in Bldgs 865 & 866

Figure 3. Relative Size, and Location of 5 RCRA Tanks in Bldg. 866



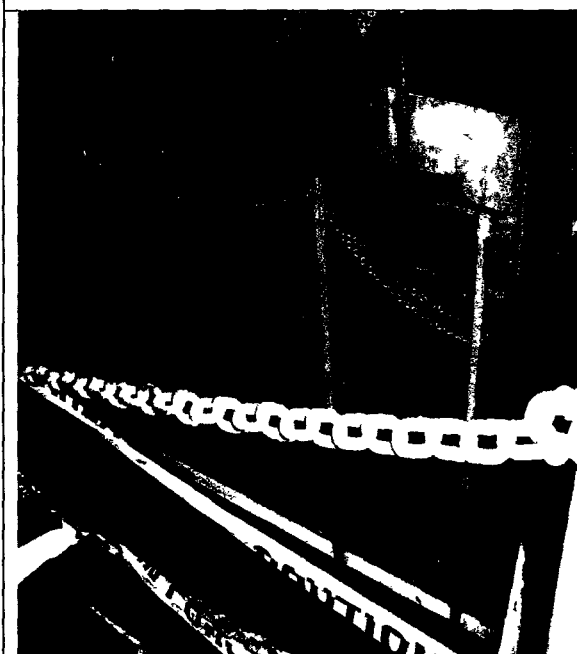
BLDG 866 PROCESS WASTE SYSTEM CLOSURE



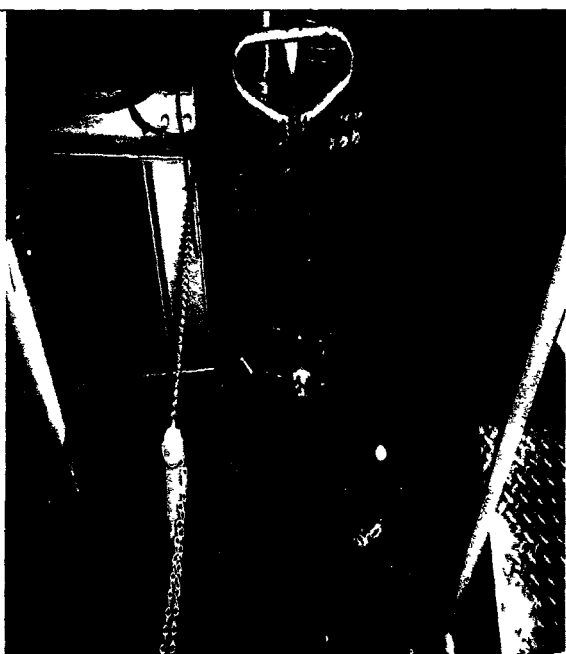
B865 Example of overhead process waste piping "T" joint located in room 145



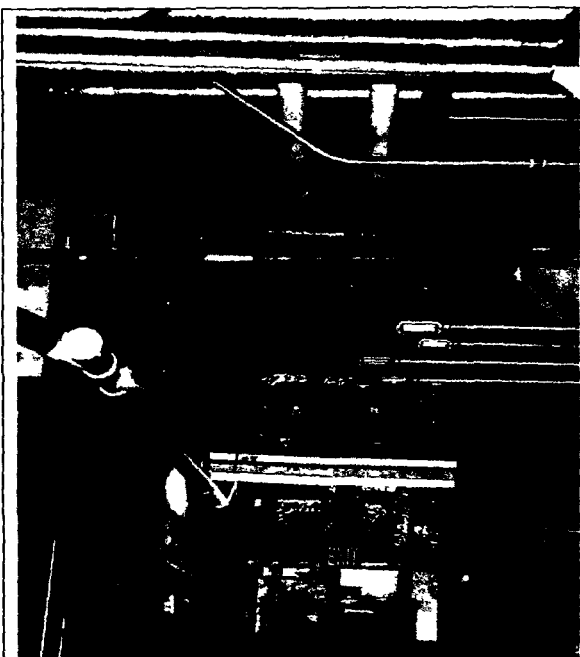
B865 Sump 145a along north wall of room 145



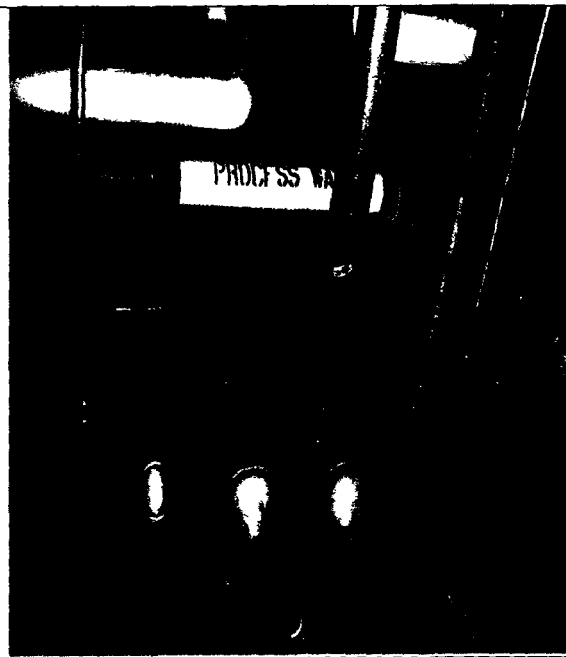
B865 Concrete lined sump 145a located along north wall of room 145



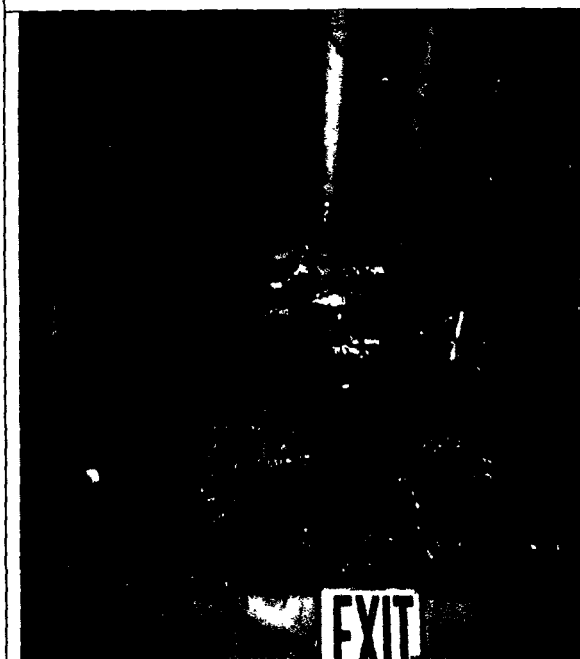
B865 Another view looking down into sump 145a



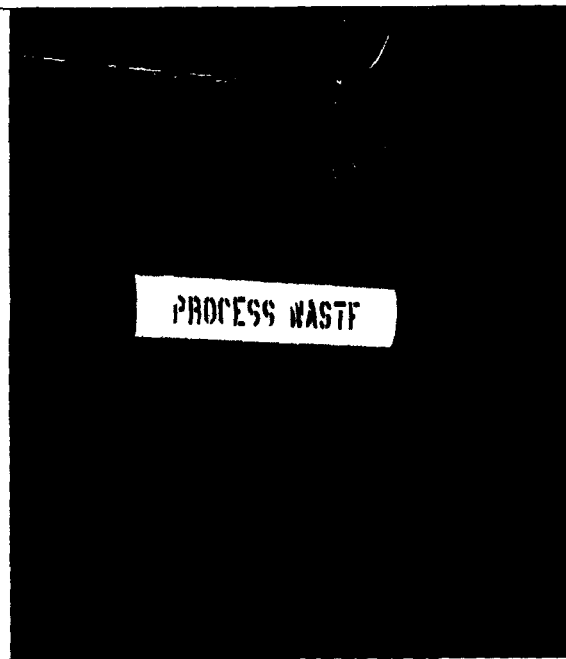
B865 Overhead process waste piping near the mechanical equipment room (room 140) along west wall



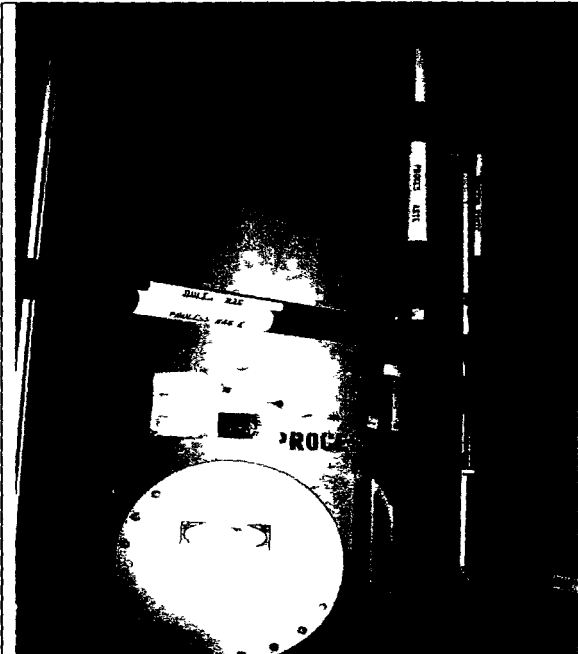
B865 Overhead process waste piping along west wall



B865 Overhead process waste lines exiting the west wall of room 145 toward B866



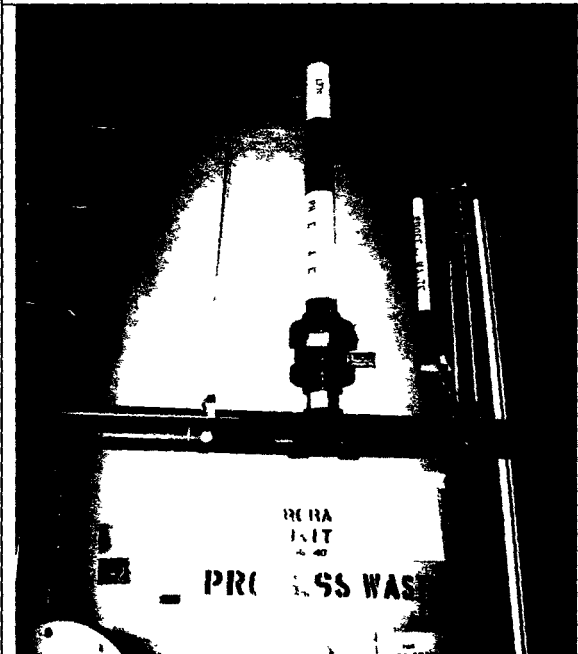
B865 Example section of overhead process waste piping located in room 145



B866 One of three process waste tanks



B866 Pumps and sump (lower left foreground) Note ancillary piping and painted secondary containment



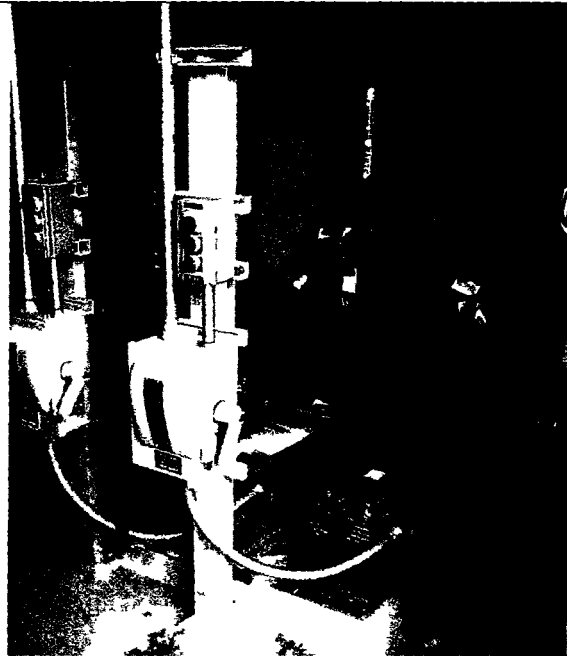
B866 Another one of three process tanks located in B866 Note ancillary piping



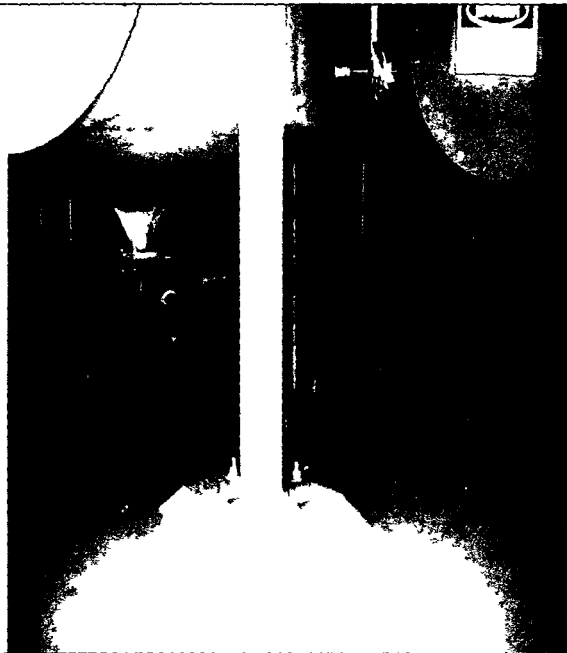
B866 One of three process waste tanks Note ancillary piping



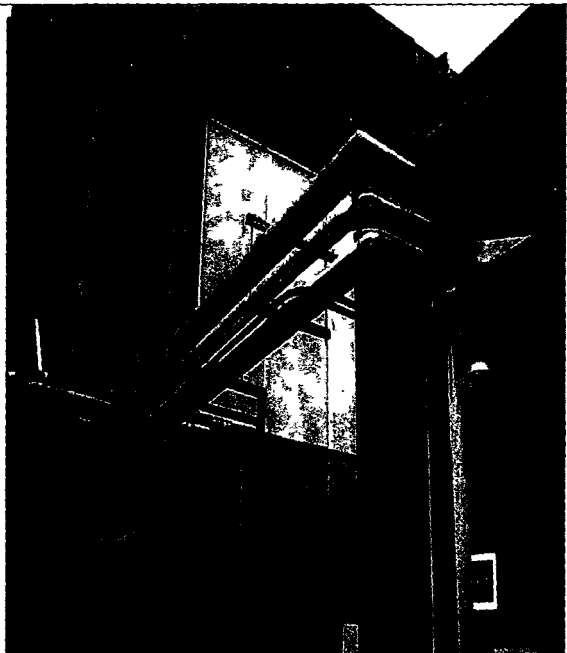
B866 One of three process waste tanks Note ancillary piping



B866 Pumps, and associated electrical boxes and piping



B866 Base of tanks showing the painted, secondary containment and piping beneath two of the tanks



B866 Elevated process waste piping from B883 to B866 (on right)